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FILED
DISTRICT COURT OF GUAM

FEB 11 2008

JEANNE G. QUINATA
Clerk of Court

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FRANCISCO SAN NICOLAS KAWAMOTO,

Defendant.

CRIMINAL CASE NO. 08-00004

UNITED STATES APPLICATION TO
DISCLOSE CERTAIN GRAND JURY
TESTIMONY

COMES NOW the United States of America, by and through undersigned counsel, and moves this Honorable Court for an order allowing the government to disclose to attorney Stephanie Flores the testimony of a witness who appeared before the Grand Jury on April 11, 2007. This case involves a particular scheme to obtain Guam driver's licenses fraudulently. The witness, who has pled guilty to document fraud, was one of those who purchased a fraudulent Guam driver's license through some of the defendants charged in this case, and can describe the methods employed to secure the license. The government makes this request pursuant to Federal Rule of Criminal Procedure 6(3)(E)(i) which allows the court to authorize the disclosure of a grand-jury matter preliminarily to or in connection with a judicial proceeding.

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1 The witness's testimony will be useful to the defense attorney in understanding the mechanics of
2 how the scheme actually worked, and the involvement of Department of Motor Vehicles
3 examiners.

4 Respectfully submitted this 11th day of February, 2008.

5 LEONARDO M. RAPADAS
6 United States Attorney
Districts of Guam and NMI

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8 By: 
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